

December 10, 2009

Ms. Cynthia Bryant
Director, Governor's Office of Planning & Research
1400 Tenth Street
Sacramento, CA 95814

RE: Comments on Prop 84 Sustainable Communities Planning Grant Guidelines

Dear Ms. Bryant:

As the Strategic Growth Council (SGC) considers guidelines for the remaining Proposition 84 sustainable communities planning grant funds, the City of San Jose offers the following comments about the proposed draft guidelines.

As Northern California's largest city and the capital of Silicon Valley, San Jose is committed to becoming a more sustainable community. To achieve that vision, the City is currently engaged in a variety of sustainable planning initiatives, including:

- A comprehensive General Plan update (Envision San Jose 2040),
- A companion Climate Action Plan to achieve San Jose's share of AB32 greenhouse gas emissions reductions,
- Facilitation of growth in the adopted Priority Development Areas under the FOCUS program for the Bay Area,
- Participation in a multi-species, multi-agency regional Habitat Conservation Plan/Natural Communities Conservation Plan, and
- Preparation of Station Area Plans surrounding multiple planned Bay Area Rapid Transit (BART) stations.

Focus on Compact, Infill Development

In their current form, the grant guidelines are too broad in scope. There should be a strategic focus on linking transportation and land use to create sustainable community strategies to implement SB 375. The SGC should set a **priority to target grant funds for local governments to plan for and promote compact, infill development** that achieves California's climate objectives, particularly funding for local government planning around transit stations that link to regional blueprints.

Additional points should be awarded for planning activities that promote collaboration between regional and local governments and for local infrastructure planning to support

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compact, infill development in existing employment and population centers supported by transit.

Prioritize Local Sustainable Planning Efforts

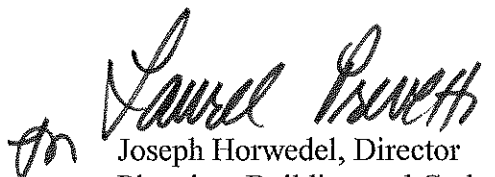
The grant guidelines must **support local government** efforts to promote compact, infill development by targeting funds to planning efforts that remove logjams to infill, and produce actual change on the ground. The SGC should fund local planning initiatives directed at resolving actual implementation realities that thwart compact, infill development, thereby lessening the risk of infill development.

The current fiscal struggles of local governments, with persistent, severe budget deficits and substantial loss of staff, create significant challenges for local governments to implement SB 375. Most planning work to create sustainable communities will occur at the local level, specifically the challenge of translating the regional blueprints down to the local level by preparing implementation plans to achieve state and regional goals. Accordingly, the guidelines should prioritize funding for local governments to prepare specific or area plans that implement regional blueprints. To promote local sustainable planning activities that can and will actually happen in the near term, the SGC should allocate 90% of grant funds for local government planning efforts and 10% for regional governments, respectively.

In disbursing grant funding among local governments, the SGC should consider regional allocation of grant funding based on population. Additionally, the SGC should consider past Regional Housing Needs Allocation performance as a measure for allocating funds for sustainable planning. Finally, a matching funds requirement will be problematic for most communities due to local government budget deficits.

The City of San Jose appreciates the opportunity to review and comment on the draft guidelines. We appreciate your consideration of our concerns, and hope they will be taken into account as you consider guidelines for the grant funds allocation.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Horwedel".

Joseph Horwedel, Director
Planning, Building and Code Enforcement